

**TRIUMVIRATE  
ENVIRONMENTAL**

April 18, 2014

Office of Enforcement and Compliance Assurance  
Office of Federal Activities -International Compliance Assurance Division (2254A)  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
**Re: 2013 Annual Hazardous Waste Export Report for EPA Notice No: 006514/2E/13**

To Whom It May Concern:

Please see the corrected summary, with all the required information, of hazardous waste exports, for calendar year 2013, shipped by Triumvirate Environmental Inc. under EPA Notice No. 006514/2E/13 is listed below. There was one shipment in 2013.

Waste was exported from:  
Triumvirate Environmental Inc.  
41 Tanner Street  
Lowell, MA 01852  
EPA ID# MAC300013695

Consignee:  
Xstrata Canada Corporation-Xstrata Nickel Sudbury Smelter  
1 Longyear Drive  
Falconbridge, ON Canada POM150

**PERMIT 505670**

STREAM: 1

1 LOADS

TOTAL KG: 18395

**Certification Statement:**

I certify under the penalty of law that I have personally examined and familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.  
Regards,

Steven Powers  
General Manager  
Triumvirate Environmental, Inc.

263 HOWARD ST  
LOWELL, MA  
978.453.7772  
TRIUMVIRATE.COM

received  
5011 4/23/2014

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EXPORTER:

TRIUMVIRATE ENVIRONMENTAL ( MERRIMACK), INC.

41 Tanner Street

Lowell, MA 01852

MAC300013695

US EPA Notice 006514/2E/13

File Number : 505670

Consignee:

Xstrata Canada Corporation-Xstrata Nickel Sudbury Smelter

1 Longyear Drive

Falconbridge, ON Canada POM1S0

<u>Shipment Date</u>	<u>Product-Description</u>	<u>DOT</u>		<u>Amt Shipped</u>	<u>Qty Pounds Shipped</u>	<u>Manifest #</u>	<u>Transporter-EPA ID Number</u>
		<u>Class</u>					
4/23/2013	Lithium Ion Batteries, UN3480, PG II	9		15 Pallets	39,970	BOL042313TD	Transport Rollex LTEE-NYF0060000053

TRIUMVIRATE  
ENVIRONMENTAL

263 HOWARD STREET  
LOWELL, MA  
01852



7012 3460 0003 4327 0897



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APR 22 2014

*Elizabeth D. Shaw*

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Office of Enforcement + Compliance Assurance  
Office of Federal Activities  
International Compliance Division (2054A)  
Environmental Protection Agency  
1000 Pennsylvania Avenue NW  
Washington, DC 20460



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CERTIFIED MAIL™



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

APR 14 2014

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

Dear Mr. Powers:

As you know, primary exporters of hazardous waste must file an annual report with EPA by March 1 of each year summarizing their exports during the previous calendar year. The annual report must include all information specified in 40 CFR 262.56 of the regulations. We have now concluded our review of the annual reports filed in 2014 for shipments made during calendar year 2013.

The 2013 annual report which you filed in 2014 is deficient in the following areas:

- \_\_\_\_\_ EPA Identification number
- \_\_\_\_\_ name, mailing address and site address of exporter
- \_\_\_\_\_ calendar year covered by the report
- \_\_\_\_\_ name and address of each consignee

by consignee, for each hazardous waste exported:

- ☒ a description of the hazardous waste
- ☒ EPA waste number (from 40 CFR part 261, subpart C or D)
- ☒ DOT hazard class
- ☒ the name and EPA ID number of each transporter used
- ☒ total amount of waste shipped and number of shipments (frequency) pursuant to each notification

Except for hazardous waste produced by exporters of greater than 100 kg but less than 1000 kg in a calendar month, unless provided pursuant to 262.41, in even numbered years:

- \_\_\_\_\_ a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated and

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\_\_\_\_\_ a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984

\_\_\_\_\_ a certification signed by the primary exporter which states:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

#### ACTION REQUIRED

\_\_\_\_\_ Please provide the missing information identified above in order to complete your annual report, together with an original signed certification as required by the regulation, as stated above. These items may be mailed to International Compliance Assurance Division/OFA/OECA, U.S Environmental Protection Agency (Mail Code 2254A), 1200 Pennsylvania Avenue, NW, Washington, DC 20460. Courier address: International Compliance Assurance Division/OFA/OECA, U.S. Environmental Protection Agency, Ariel Rios Building, Room 6144, 1200 Pennsylvania Avenue, NW, Washington, DC 20004. **Reports may also be faxed to 202/564-0073.**

✓  
\_\_\_\_\_ Enclosed is the annual report you submitted to us. We are returning it because a report with the indicated information missing cannot be accepted for processing. Please submit a complete annual report with signed certification to either the mailing or courier addresses above

This request to provide a complete annual report does not preclude or limit the USEPA from taking an enforcement action(s) for the initial failure to submit a timely or complete annual report as is required by 40 CFR 262.56.

Sincerely,

*Scott D. Wilson*

Robert G. Heiss, Director  
International Compliance Assurance Division  
Office of Federal Activities

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p><i>Valene Spriani</i></p>	
<p>1. Article Addressed to:</p> <p>STEVEN POWERS TRIMMEDIATE ENVIRONMENTAL 41 TANNER STREET LOWELL, MA 01852</p>		<p>B. Received by (Printed Name) C. Date of Delivery</p> <p><i>Valene Spriani</i> <i>4/10</i></p>	
<p>2. Article Number (Transfer from service label)</p> <p>7008 3230 0000 9485 0063</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
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<p>Sent To <i>Steven Powers TEM (Merrimack) Inc.</i></p> <p>Street, Apt. No., or PO Box No. <i>sent</i> <i>APR 14 2014</i></p> <p>City, State, ZIP+4</p>	
<p>PS Form 3800, August 2006 See Reverse for Instructions</p>	



**TRIUMVIRATE  
ENVIRONMENTAL**

February 27, 2014

Office of Enforcement and Compliance Assurance  
Office of Federal Activities  
International Compliance Assurance Division (2254A)  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

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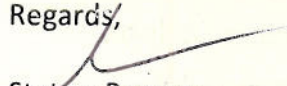
**PERMIT 505670**

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1 LOADS  
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General Manager  
Triumvirate Environmental (Merrimack), Inc.

263 HOWARD ST  
LOWELL, MA  
978.453.7772  
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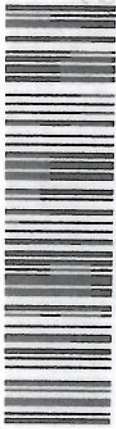
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TRIUMVIRATE  
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LOWELL, MA  
01852

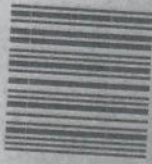


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